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April 26, 2005

**BY CM/ECF**

The Honorable Kent A. Jordan  
United States District Court  
District of Delaware  
844 North King Street  
Room 6325 - Lock Box 10  
U.S. Courthouse  
Wilmington, DE 19801

Re: **Sisofo v. AstraZeneca Pharmaceuticals, LP**  
**C.A. No. 04-196 KAG**

Dear Judge Jordan:

At the suggestion of your secretary, I am writing on behalf of myself and the Plaintiff's attorney, Gary Aber, to request a change in Your Honor's Scheduling Order, under which the discovery cutoff was January 28, 2005 and case-dispositive motions were to be filed by March 31, 2005. The parties had concentrated efforts on resolving the matter through a mediation with Judge Thyng, an effort that is still ongoing, but as a result, missed the foregoing dates. Mr. Aber would like to take one further 30(b)(6) deposition, and I have agreed on behalf of my client. Also, the Defendant would like to file for summary judgment and Mr. Aber has agreed that the time for filing case dispositive motions can be extended to allow a summary judgment motion to be filed. Of course, all of the foregoing is subject to Your Honor's approval. Therefore, we jointly request that the discovery cutoff be extended to allow one further 30 (b)(6) deposition on behalf of the Plaintiff, and that case dispositive motions be permitted to be filed on or before June 3, 2005. Your secretary advised that this will, likely, result in our losing our trial date of August 29, 2005, and both sides understand and accept that eventuality.

Respectfully yours,



Sheldon N. Sandler

SNS:sde

cc: Clerk, District Court (by hand delivery)  
Gary W. Aber, Esquire (by CM/ECF)